

**APPLICATION GRANTED  
SO ORDERED**   
**VERNON S. BRODERICK  
U.S.D.J.** 5/25/2023

May 24, 2023

Parties shall submit their joint status letter and proposed case management plan by June 2, 2023.

**Via ECF**

Hon. Vernon S. Broderick  
 United States District Court  
 Southern District of New York  
 40 Foley Square, Room 415  
 New York, NY 10007

**Re: *Brachvogel v. South Bay Energy Corp.*, Case No. 23 Civ. 184 (VSB)**

Dear Judge Broderick,

We write on behalf of Plaintiff and the Proposed Class pursuant to Rule I.G of Your Honor's Individual Rules & Practices in Civil Cases, with Defendant's consent, to request a one-week extension of the deadline for the parties to submit their joint letter and proposed case management plan and scheduling order.

The Court's May 23, 2023 Order and Notice of Initial Conference (ECF No. 21) sets the parties' deadline as May 26. Due to previously scheduled briefing due that day in two of the undersigned's matters pending in this District, as well as other pending case-related commitments in the early part of next week, Plaintiff's counsel requires additional time to work with defense counsel to prepare the materials requested by the Order and Notice of Initial Conference.

Defendant consents to the requested new deadline. This is Plaintiff's first request for extension of this deadline.

The original and requested new deadlines are as follows:

| <b>Document</b>   | <b>Original Deadline</b> | <b>Requested Deadline</b> |
|---|--------------------------|---------------------------|
| Joint Letter and Proposed Case Management Plan and Scheduling Order | May 26, 2023             | June 2, 2023              |

Thank you for the Court's consideration of this request.

Respectfully Submitted,

/s/ J. Burkett McInturff  
 J. Burkett McInturff

*Counsel for Plaintiff and the  
Proposed Class*

cc: All Counsel of Record (*via ECF*)